

U.S. DISTRICT COURT  
OF OHIO  
CLEVELAND

) INDICTMENT

5:19 CR 274

) CASE NO.

Title 18, United States Code,  
Sections 371, 922(u), 924(i)(1),  
and 2

**JUDGE PEARSON**

(Theft of Firearms from Licensed Firearms Dealer, 18 U.S.C. § 922(u))

1. On or about February 2, 2019, in the Northern District of Ohio, Eastern Division, Defendants ROBERT CLARK, JR., MARQUELIS THOMAS, SHYMEIK BARKLEY, GOD GIBSON and JAMARYON FRAZIER did knowingly steal and did knowingly aid and abet each other in stealing firearms, specifically: five (5) SCCY Industries, Model CPX-1, 9mm pistols, bearing serial numbers 700524, 701733, 709872, 710127 and 751328; a SCCY Industries, Model CPX-2, 9mm pistol, bearing serial number 710362; a Springfield Armory, Model XDG, 9mm pistol, bearing serial number GM747392; a Springfield Armory, Model XD, 9mm pistol, bearing serial number XD857218; a Springfield Armory, Model XDE, 9mm pistol, bearing serial number HE928402; a Springfield Armory, Model XDS, 9mm pistol, bearing serial number S3655261; a

Walther Arms, Model PPQ-M2, 9mm pistol, bearing serial number FCH3166; a Bersa, Model BPCC, 9mm pistol, bearing serial number H32838; a Beretta, Model 92FS, 9mm pistol, bearing serial number A188093Z; a Glock, Model G17 Gen4, 9mm pistol, bearing serial number BGMT753; a Glock, Model G17 Gen5, 9mm pistol, bearing serial number BGLV821; a Glock, Model G19 Gen5, 9mm pistol, bearing serial number BGVP610; a Glock, Model G19 Gen4 FS, 9mm pistol, bearing serial number BFRN731; a Glock, Model 19x, 9mm pistol, bearing serial number BHWR265; a FN Manufacturing, Model Five-Seven, 5.7 x 28 mm caliber pistol, bearing serial number 386351825; two (2) Anderson MFG, Model AM-15 BR, 5.56 x 45 mm rifles, bearing serial numbers 18177482 and 18177486; and, a Honor Defense, Model Honor Guard, 9mm pistol, bearing serial number 0002683, from the premises of Elite Security Consultants LLC., a business licensed to engage in the business of dealing in firearms, said firearms being from Elite Security Consultants LLC.'s business inventory, and said firearms having been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(u), 924(i)(1) and 2.

COUNT 2

(Conspiracy to Commit Theft of Firearms from Licensed Firearms Dealer, 18 U.S.C. § 371)

The Grand Jury further charges:

2. On or about February 2, 2019, in the Northern District of Ohio, Eastern Division, Defendants ROBERT CLARK, JR., MARQUELIS THOMAS, GOD GIBSON and JAMARYON FRAZIER, knowingly, willfully and unlawfully combined, conspired and agreed together and with each other, to commit an offense against the United States, to-wit: to knowingly steal firearms from the premises of Stark Arms, a business licensed to engage in the business of dealing in firearms, said firearms being from the Stark Arms business inventory and

said firearms having been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 371, 922(u), 924(i)(1) and 2.

OVERT ACTS

3. In furtherance of the conspiracy, and to effect the objects and conceal the existence thereof, Defendants performed overt acts in the Northern District of Ohio, including, but not limited to the following:

A. On or about February 2, 2019, in the early morning hours, GIBSON drove CLARK, THOMAS and FRAZIER to the Stark Arms business premises at \*\*\*\* Cleveland Avenue S.W., Canton, Ohio 44707.

B. After they arrived at the Stark Arms business, GIBSON parked the vehicle he was driving and CLARK, THOMAS and FRAZIER exited GIBSON's vehicle wearing gloves and items of clothing covering their faces to conceal their identities.

C. CLARK, THOMAS and FRAZIER walked up to the Stark Arms business and attempted to gain entry to the business to steal firearms by throwing a heavy metal object at a window of the business.

All in violation of Title 18, United States Code, Section 371.

FORFEITURE

The Grand Jury further charges:

4. For the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), the allegations of Count 1 are incorporated herein by reference. As a result of the foregoing offense, Defendants ROBERT CLARK, JR., MARQUELIS THOMAS, SHYMEIK BARKLEY, GOD GIBSON and

JAMARYON FRAZIER shall forfeit to the United States any and all property (including the firearms) involved in or used in the commission of such violations.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.